Before the
Federal Communication Commission
Washington D.C., 20554

In the matter of:	)	
	)	
	)	
Murphy D. Boughner	)	
Licensee of Station KGCT-CD	)	
Nowata, Oklahoma	)	
	)	CSR 8870-M
v.	)	Docket No. 14-15
	)	
Cable One, Inc.	)	
4127 Nowata Road	)	
Bartlesville, OK 74006	)	

To: The Secretary
Attn: Chief, Media Bureau

RESPONSE TO OPPOSITION

Murphy D. Boughner ("MDB"), licensee of KGCT-CD, Nowata, Oklahoma hereby responds to Cable One's (Cable) OPPOSITION TO MUST CARRY COMPLAINT (Opposition).

Cable's Opposition is the first time MDB was privy to the test data used to document their inability to obtain sufficient signal strength at their principal head end to qualify KGCT for Must Carry status. They document a high gain, directional antenna affixed at the158 foot level of their 365-foot tower. No notation of the antenna orientation azimuth is given. The azimuth from Cable to KGCT is 103.05 degrees[1].

[1] Determined from geographic coordinates using Great Circle method per FCC online calculator.

Cable documents a Wade model WH14-69/HP high gain, Helical antenna was used for conducting the signal strength tests. The antenna can be seen affixed slightly less than halfway up their tower[2]. The antenna azimuth is almost due South (180 degrees). The published horizontal half power bandwidth of the antenna is 15 degrees off axis. An increase in observed signal strength would have been obtained by orienting the helix axis 70 to 80 degrees east (toward KGCT at 103 degrees).

Ground elevations for Cable's tower and KGCT are 678.9 feet Above Mean Sea Level (AMSL) and 748.8 feet AMSL respectively. That places Cable's antenna at 836.9' AMSL and KGCT's antenna at 841.2' AMSL. A quick look at the propagation path on a USGS Nowata Quadrangle TOPO map shows a distinct 866 foot hill directly in the path.

Additional elevation data points[3] allow displaying the path graphically. Figure 3 clearly shows the propagation path doomed to fail from terrain shielding[4].

Had Cable chosen to affix their receiving antenna at the 350' level of their 365' tower, the propagation path would have cleared the almost 900' terrain obstacle[5].

In 2001 Cable chose to move their head end outside KGCT's coverage area. The move was naturally to realize economy of scale since they also serve the much larger city of Bartlesville, Oklahoma. Prior to decommissioning the head end in Nowata, Cable installed and over the next eleven (11) years maintained equipment at KGCT's transmitter site to acquire a demodulated base band signal for redistribution to Nowata.

Cable's opposition refers to Commission rules barring "extraordinary measures". MDB contends this hardly constitutes extraordinary measures. Most PEG, Educational

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[2] See attached Figures 1 & 2.
[3] See attached Figures 5 & 6.
[4] See attached Figure 3
[5] See attached Figure 4.

and Local Governmental channels would not exist without the use of such back-feed technology. Cable uses that method regularly to provide coverage of Bartlesville area High School sporting events and community events. The same coverage KGCT provides Nowata County but is now unable to deliver to Nowata City cable subscribers.

Cable takes issue with KGCT's use of the term grandfathering. MDB contends Cables opportunity to discontinue carriage was back in 2001 when they moved their head end out KGCT's coverage area, NOT eleven (11) years later!

Completely absent from Cable's discourse is any reference to Serving the Public Interest. As stated in MDB's initial filing, the request for relief is the direct result of continual pleadings and support from the public to do something to get KGCT back on cable. Included in the initial filing are letters of support from the Sheriff of Nowata County, the Mayor of the City of Nowata and others. All testimonials to the prime directive of all licensee's. FCC licensees are required to "render such service as will serve the public interest." License documents even include that language. Cable's opposition is silent on how their action after 15 years serves the public interest.

MDB contends Cable arbitrarily discontinued carriage. MDB further contends Cable was either lax and failed to observe good engineering practices in establishing test conditions or did not seriously attempt to obtain KGCT's signal. MDB wishes the Commission to note KGCT is a low power station. As such our signal is not as robust as full power stations. Even if sufficient signal could be obtained using proper engineering on Cable's part, the method of acquiring KGCT used for the past 11 years is superior, thus better serving the public.

KGCT continues to deliver base band audio and video to cable via equipment at KGCT's transmitter site. Pursuant to Section 76.7 (a)(1)[6], MDB requests the Commission order Cable to remake the connection severed in September 2012 and reinstate carriage of KGCT to the same cable channel on their Nowata cable system. KGCT serves the public interest. Cable seems to believe they need an order from the Commission to do likewise.

I hereby certify the above statements to be true and correct to be best of my knowledge.

Murphy D. Boughner
Licensee, KGCT-CD
P.O. Box 186
Nowata, Oklahoma 74048
918.273.2212
NowataTV25@yahoo.com

Subscribed and sworn to before me this 28 **day of** February, ~~2013~~ 2014

Karen Freeman — 1-9-16
Notary Public — My Commission Expires

[SEAL]

KAREN FREEMAN NOTARY PUBLIC IN AND FOR STATE OF OKLAHOMA EXPIRES 1-9-2016 COMMISSION # 99019649

[6] 47CFR Section 76.7(a)(1) "the Commission may waive any provision of this part 76, impose additional or different requirements…"

CERTIFICATE OF SERVICE

I further certify that on this 28 day of February 2014, I served the attached documents by first-class mail, Mail, postage prepaid, on:

William Lake, Esq.*
Chief, Media Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Mr. Dick Marnell
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210 E. Earll Drive
Phoenix, AZ 85012

*Via ECFS

M D. Boughner 2/28/2014
Murphy D. Boughner

Figure 1

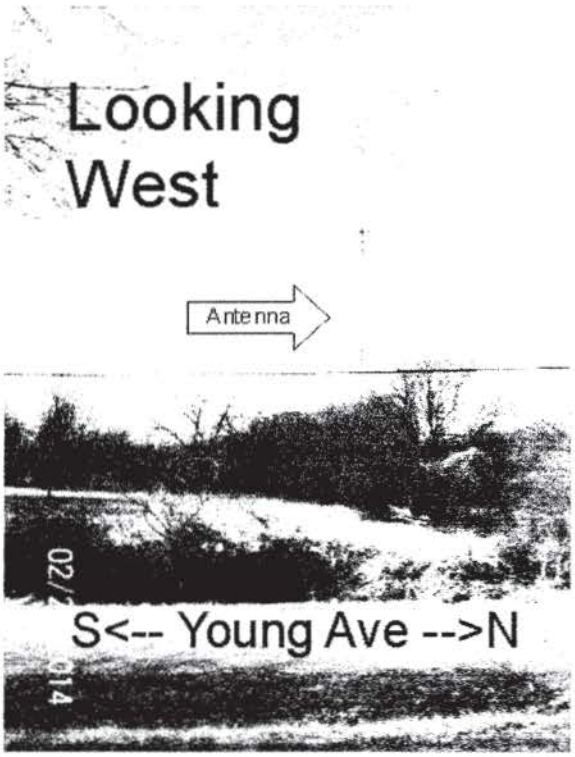

Figure 2

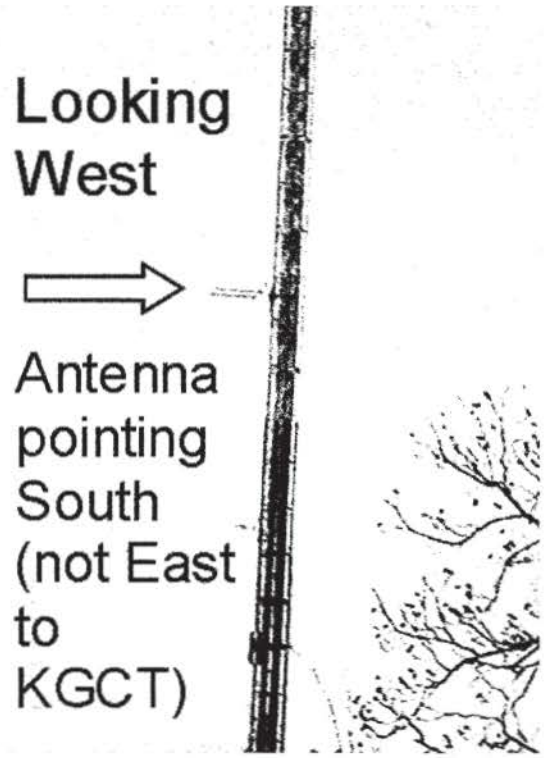

Figure 3

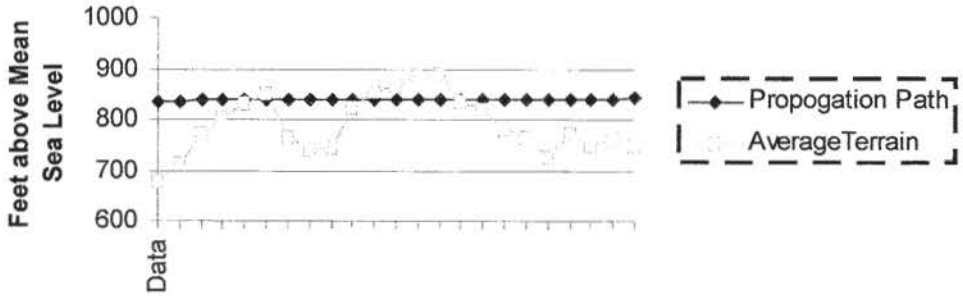

Figure 4

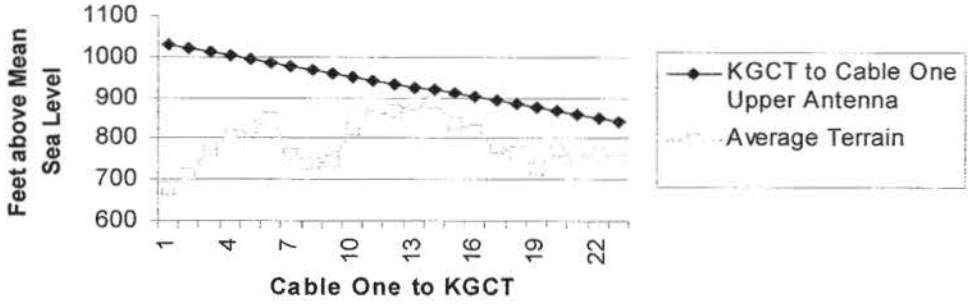

Figure 5, Google map of propogation path from Cable to KGCT.

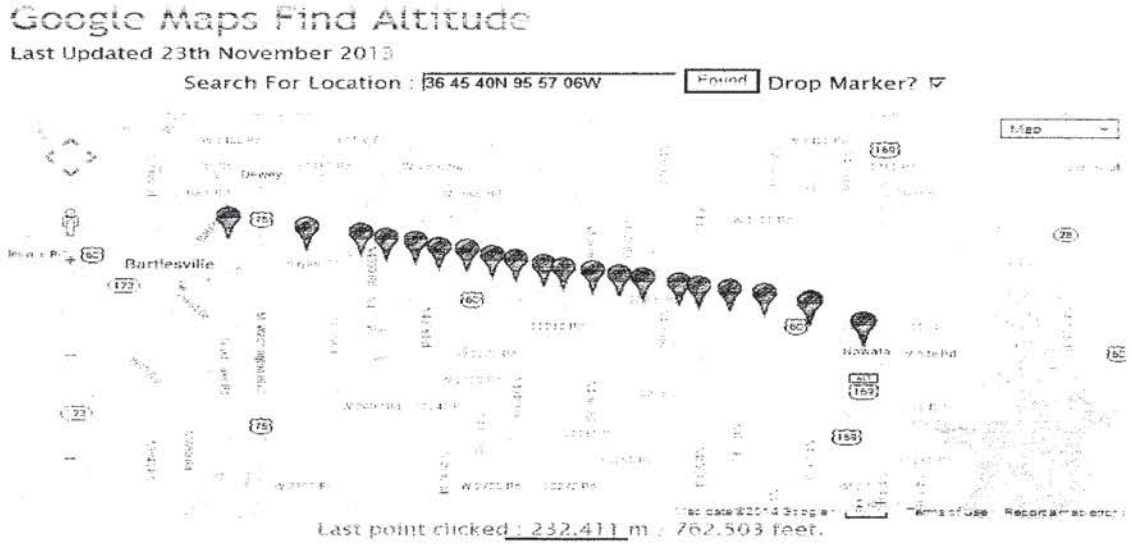

Figure 6, Propogation path coordinates and elevation data.

latitude	longitude	meters	Ground Elevation feet	RX ant at 158 foot level		RX ant at 350 foot level
36.76051	-95.9516	206.941	678.941	836.941	1	1028.941
36.75484	-95.9134	217.887	714.852	837.128	2	1020.407
36.75154	-95.8866	235.839	773.749	837.3149	3	1011.874
36.74879	-95.8743	245.335	804.904	837.5019	4	1003.34
36.74714	-95.8598	252.869	829.624	837.6888	5	994.8063
36.74384	-95.8482	259.396	851.038	837.8758	6	986.2726
36.74274	-95.8344	232.559	762.988	838.0627	7	977.7389
36.73943	-95.8221	226.206	742.146	838.2497	8	969.2052
36.73723	-95.8104	227.069	744.976	838.4367	9	960.6715
36.73448	-95.7967	250.604	822.193	838.6236	10	952.1379
36.73283	-95.787	260.162	853.551	838.8106	11	943.6042
36.73228	-95.7795	264.132	866.575	838.9975	12	935.0705
36.73118	-95.7726	270.298	886.803	839.1845	13	926.5368
36.73084	-95.7713	270.808	888.477	839.3714	14	918.0031
36.72898	-95.7596	254.746	835.78	839.5584	15	909.4695
36.72733	-95.7479	249.994	820.191	839.7454	16	900.9358
36.72458	-95.7301	238.093	781.146	839.9323	17	892.4021
36.72293	-95.7204	233.338	765.545	840.1193	18	883.8684
36.72127	-95.7053	221.242	725.858	840.3062	19	875.3347
36.71907	-95.6882	234.952	770.841	840.4932	20	866.801
36.71522	-95.6655	228.171	748.592	840.6801	21	858.2674
36.71412	-95.6662	232.411	762.503	840.8671	22	849.7337
36.70347	-95.6397	228.248	748.847	841.2	23	841.2